

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
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Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

March 14, 2017

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

On behalf of the plaintiffs, and with defendant's consent, we write to request an extension of the deadline for plaintiffs to file their fee application for sanctions imposed on Perouz Sedaghaty, from March 15, 2017, to March 28, 2017, to afford sufficient time to coordinate among the plaintiffs firms and to meet and confer with Mr. Alan Kabat, counsel for Mr. Sedaghaty.

In Your Honor's order of February 15, 2017 (ECF No. 3447), Your Honor set March 15 as the deadline for the plaintiffs to file a fee petition and indicated that the parties were to have met and conferred in advance of that filing. However, the snow in the northeast stalled plaintiffs' coordination for the filing, which in turn prevented the parties from scheduling any potentially fruitful meet and confer. Moreover, because Mr. Kabat is travelling for the next week, he has suggested that, in lieu of a rushed and ill-informed meet and confer before he travels, we adjourn the meet and confer until after he returns next week.

Under the circumstances, and with Mr. Kabat's agreement, plaintiffs request that the deadline for plaintiffs' fee application regarding Mr. Sedaghaty be reset for March 28, 2017.

Respectfully,

/s/ Robert T. Haeefe
ROBERT T. HAEFELE

PLAINTIFFS' EXECUTIVE COMMITTEES

cc: The Honorable George B. Daniels, via Facsimile and ECF
Alan R. Kabat, Esq., counsel for Perouz Sedaghaty, via ECF
All Counsel of Record via ECF